

Battaglia, Frank

To: Rick Kowalski; Tisa, Kimberly
Cc: Stephen Graham; Joseph F Guarnaccia; Aaron Ting; Battaglia, Frank
Subject: RE: Former Ciba-Geigy, Cranston, RI - CMI Work Plan - Response to Comments
Attachments: Appendix F pg 18- SAP-BASF Cranston_ 9-5-17 rev 05-08-18.pdf; 363655 RTC Letter-CMI WP-180 Mill St Cranston RI 04-30-18.pdf

Joe/Rick, this e-mail with the attachments will suffice for the highlighted text and the attached Appendix F page 18.

Kim and I have also reviewed your May 1, 2018 e-mail response to our comments transmitted to you on the April 26th conference call and accept the changes except for the comment #10 which has been addressed by the highlighted text below and the Appendix F attachment.

on the February 23 2018 obtained during our

DRAFT

From: Rick Kowalski [mailto:rkowalski@aeiconsultants.com]

Sent: Tuesday, May 08, 2018 3:49 PM

To: Tisa, Kimberly <Tisa.Kimberly@epa.gov>; Battaglia, Frank <battaglia.frank@epa.gov>

Cc: Stephen Graham <sgraham@aeiconsultants.com>; Joseph F Guarnaccia <joseph.guarnaccia@basf.com>; Aaron Ting <ating@aeiconsultants.com>

Subject: RE: Former Ciba-Geigy, Cranston, RI - CMI Work Plan - Response to Comments

Ok, BASF agrees to include sidewall sampling on a 5-ft grid for excavations deeper than 1 ft. I have attached the revised pg. 18 of Appendix F which reflects this change (clean and tracked versions). Please let us know if we need to resubmit revised Responses to Comments and/or hard copies of the attached, or if this email will suffice. Thanks,

Richard G. Kowalski, CPG, LSP, CHMM
Senior Hydrogeologist

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From: Tisa, Kimberly <Tisa.Kimberly@epa.gov>

Sent: Monday, May 07, 2018 12:03 PM

To: Rick Kowalski <rkowalski@aeiconsultants.com>; Battaglia, Frank <battaglia.frank@epa.gov>

Cc: Stephen Graham <sgraham@aeiconsultants.com>; Joseph F Guarnaccia <joseph.guarnaccia@basf.com>; Aaron Ting <ating@aeiconsultants.com>; Tisa, Kimberly <Tisa.Kimberly@epa.gov>

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SEMS DocID 645555

Frank and I have not had time to discuss these revisions, but I did want to get back to you in the interim on your response to Comment 10.

EPA must disagree that the TSCA regulations do not cover the sidewalls. Specifically, § 761.283(b)(1) states "Use a square-based grid system to overly the **entire** area to be sampled." This of course would include sidewalls since you are also trying to confirm the PCB cleanup standard has been achieved. If the excavation depth is < 5 feet, you would still collect a sample, unless it is a shallow excavation. We generally don't

require such sampling if excavation depths are < 1 foot or so, as we would use the lateral sampling data to support the extent.

In fact, the easiest way to consider the excavation area is to collapse the sidewalls, similar to how you would flatten a box and then overlay the grid on each surface.

Your reference to the "two-dimensional grid" is found at § 761.283(b)(2), which follows the initial grid layout described under § 761.283(b)(1).

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From: Rick Kowalski [<mailto:rkowalski@aeiconsultants.com>]
Sent: Tuesday, May 01, 2018 1:50 PM
To: Tisa, Kimberly <Tisa.Kimberly@epa.gov>; Battaglia, Frank <battaglia.frank@epa.gov>
Cc: Stephen Graham <sgraham@aeiconsultants.com>; Joseph F Guarnaccia <joseph.guarnaccia@basf.com>; Aaron Ting <ating@aeiconsultants.com>
Subject: Former Ciba-Geigy, Cranston, RI - CMI Work Plan - Response to Comments

Dear Kim and Frank: Attached are BASF's Responses to Comments as a follow-up to our conference call on April 26, 2018. Attached to this letter are clean and tracked versions of the pages from the CMI Work Plan that were revised. Only the first page of revised Table 4.1 is included. If you would like a complete version of the revised table, we can include a clean version with the hard copy to be sent to you this week. Please let us know if you have any questions. Thanks,

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Senior Hydrogeologist

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